

Appendix 1

Implementation Schedule/Action Points from the Investigation into Unauthorised disclosure of confidential information.

Theme	Specific Actions	Lead Officer	Date for Completion	Comments
Action 1. Increase Openness and transparency	(a) Review Council's publication scheme to ensure it is as comprehensive, and is in the upper quartile of local authorities (if indicators exist).	Head of ICT/ Monitoring Officer		
	(b) Publicise the open government licence more prominently and review visibility and accessibility of information covered by the licence.	Head Of ICT		
	(c) Ensure practice in FOI cases is based on practical presumption of disclosure rather than limited to what the Council is legally obliged to disclose.	Head of ICT/Monitoring Officer		
Action 2. Change the way	a) The current report writing protocol	Monitoring Officer/SLT		

<p>the Council deals with Exempt and Confidential reports and meetings to reflect best practice</p>	<p>be revised to put more emphasis on restricting the number of items that go into part II</p>			
	<p>(b) Where there is a need for part II reports, ensure that as much of the information as is not exempt is put into the part 1 agenda and that any part II reports include only strictly exempt information (preferably in the form of appendices rather than full reports</p>	<p>SLT/Monitoring Officer</p>		
	<p>(c) Provide training for lawyers, committee administrators and report originators about criteria for exemption and apply a more robust test of what is in the public interest (where possible, always in favour of disclosure.)</p>	<p>Monitoring Officer</p>		
	<p>d) Ensure fuller reasons are given for exemption, not just a reference to the relevant paragraph number in the Local</p>	<p>SLT/Monitoring Officer</p>		

	Government Act 1972 Act.			
	(e) Encourage Chairs of Committees Challenge need for exemption	Informal Chairs/Chief Executive/SLT/Monitoring Officer		
	(f) Ensure that the overall quality of reports presented to Members is high and readily intelligible to a person with no special knowledge of the subject.	SLT/Monitoring Officer		
	(g) Review circulation of Part II papers and limit them to Members of the Committee and Officers/ other Members with a genuine need to know	SLT/Monitoring Officer		
	(h) Consider better use of Modern Gov facility to reduce paperwork and help limit accidental circulation of part II papers.	Leader/CE/MO		
	<ul style="list-style-type: none"> Review attendance at part II 	CE/Informal Chairs/MO		

	meetings (Members, Political Assistants, Other Officers) so that it is limited to those with a genuine need to attend.			
Action 3. Review, Update and modernise Council Codes and Protocols	(a) Amend the existing Code of Conduct for Members to require co-operation with investigation regarding leaks, including access to all relevant material. Failure to co-operate becomes a breach of the code.	MO		
	(b) Amend use facilities and use of ICT protocol, including a power to withdraw facilities. This has to be done on a case by case basis having regard to proportionality and the law.	MO		
	(c) Adopt social media protocol for Members and Officers (we currently have guidance for Officers only, which is not widely publicised	CE/MO/Head of Comms/Head of ICT		

	(d) Review and re-launch the Member and Officer guidance on confidentiality.	MO		
	(e) Review the Officer Code of Conduct and the Member/Officer Code to ensure they reflect best practice regarding confidentiality.	MO		
	(f) Review current practices to ensure that confidential and exempt information, whatever the context and whatever the medium of communication, is easy to identify by colour coding, labelling, awareness raising etc.	MO/Head of ICT/SLT		
Action 4. Media protocol	(a) A revised and updated protocol be presented to the Leaders Group.	Head of Comms/MO		
	(b) Ensure that, where practicable, Members are informed about press	Head of Comms		

	released before, or at least at the same time, as the media. This should be done by copying Group Leaders into all press releases as they go out if not before.			
Action 5. Get Commitment from Key Players in the Organisation	(a) Seek the agreement of Leaders' Group to this action plan and support to its principles	MO/CE		
	(b) Take a high level report to Audit and Standards Committee on confidentiality and the proposed actions	MO		
	(c) Seek appropriate Committee/full Council agreement to changes to the relevant codes and practices (some of these are reserved to full Council, others can be dealt with by the Audit & Standards Committee.)	MO		
	(d) Get SLT and CMT agreement to	CEO/MO		

	new practice			
	(e)Ensure there is Corporate message from Chief Executive and Leader/Group Leaders reinforcing corporate commitment to openness and transparency as well as respecting confidentiality.	CEO/Group Leaders		

